

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DENNIS WILSON, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LSB INDUSTRIES, INC., JACK E. GOLSEN,  
BARRY H. GOLSEN, MARK T. BEHRMAN,  
TONY M. SHELBY, and HAROLD L.  
RIEKER, JR.

Defendants.

Case No. 1:15-cv-07614-RA-GWG

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR (I) PRELIMINARY  
APPROVAL OF SETTLEMENT, (II) CERTIFICATION OF THE SETTLEMENT  
CLASS AND (III) APPROVAL OF NOTICE TO THE SETTLEMENT CLASS**

Please take notice that lead plaintiffs Dennis Wilson (“Lead Plaintiff”) and Camelot Event Driven Fund (“Camelot,” and together with Lead Plaintiff, “Plaintiffs”), individually and on behalf of all others similarly situated, will hereby move this Court on a date and at such time as may be designated by the Honorable Ronnie Abrams, Courtroom 1506, United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007 for an order: (i) granting Preliminary Approval of the Proposed Settlement; (ii) granting certification of the Settlement Class for settlement purposes, certifying Plaintiffs as class representatives, and appointing Lead Counsel as class counsel for purposes of the Settlement; (iii) granting approval of the form and manner of giving notice of the proposed Settlement to the Settlement Class Members; and (iv) setting a date for a Settlement Hearing and deadlines for providing notice of the Settlement, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of

Plaintiffs' motion for final approval of the Settlement, and the filing of Lead Counsel's application for attorneys' fees and expenses.

This motion is based upon the accompanying Memorandum of Law, the Declaration of Casey E. Sadler and the exhibits thereto ("Sadler Declaration"), both filed simultaneously herewith, and other such matters and argument as the Court may consider at the hearing on this motion. The Defendants, as defined in the Stipulation and Agreement of Settlement (Exhibit 1 to the Sadler Declaration), do not oppose this motion.

DATED: January 18, 2019

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*Lead Counsel for Plaintiffs and the  
Settlement Class*

**PROOF OF SERVICE**

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On January 18, 2019, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 18, 2019.

*s/ Casey E. Sadler*

Casey E. Sadler